

**MERCHANT  
LAW GROUP LLP**

75 SOUTH BROADWAY, SUITE 409, WHITE PLAINS, NEW YORK 10601 TELEPHONE 212-658-1455 FACSIMILE 877-607-5419  
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VIA CM/ECF

July 7<sup>th</sup>, 2015

Re: United States v. Rene Cardona  
14 CRIM 314 (RA)

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

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Dear Judge Abrams:

I write to respectfully request a two week extension, to July 27<sup>th</sup>, 2015, for the defense to file Mr. Cardona's sentencing memorandum. The reason for my request is that I will be on trial with the Honorable Brenda K. Sannes, in the Northern District of New York, commencing July 13<sup>th</sup>, 2015, which is the day on which Mr. Cardona's sentencing memorandum is currently due. My trial preparations in that case are taking far longer than expected and, just yesterday, Judge Sannes requested briefing on two rather complicated legal issues.

The Government consents to my request for an adjournment provided that the deadline for the Government to file its sentencing memorandum and the sentencing itself are extended by two weeks to August 3<sup>rd</sup>, 2015, and, to on or around August 21<sup>st</sup>, 2015, respectively.

This is defense counsel's second request for an extension. The Court granted our first request which was incidental to our request for an extension to file our objections to the PSR (ECF Nos. 83 & 85).

Respectfully,

Merchant Law Group LLP

By: Daniel DeMaria

Daniel DeMaria (DD4130)

Application granted. Sentencing is adjourned until August 20, 2015 at 11:30 a.m. Submissions will be due as proposed. No further adjournments will be granted. SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
July 8, 2015